

UNITED STATES DISTRICT COURT

for the

Eastern District of Wisconsin

United States of America
v.
Stanley J. Seifert III (dob 5/26/1977)

Case No. 22-m-732

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 29, 2022 in the county of Kewaunee in the
Eastern District of Wisconsin, the defendant(s) violated:

Code Section

18 U.S.C. § 2251(a)

Offense Description

Sexual Exploitation of a Minor, JV-1 (dob xx/xx/2005), by knowingly using, persuading, inducing, and enticing JV-1 to engage in sexually explicit conduct for the purpose of producing and transmitting a live visual depiction of such conduct, using any means and facility of interstate and foreign commerce, produced and transmitted using materials mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer, and transmitted using any means or facility of interstate and foreign commerce.

This criminal complaint is based on these facts:

See Attached Affidavit of FBI Special Agent Michael Meyer

☒ Continued on the attached sheet.

Michael P. Meyer

Complainant's signature

FBI Special Agent Michael Meyer

Printed name and title

Sworn via telephone; transmitted via email
pursuant to Fed. R. Crim. 4.1

Date: 9/22/2022

City and state: Green Bay, Wisconsin

James R. Sickel

Judge's signature

Honorable James R. Sickel

Printed name and title

**AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT
AND ARREST WARRANT**

Michael R. Meyer, being first duly sworn, states as follows:

1. I have been a Special Agent with the Federal Bureau of Investigation ("FBI") since April 2006. Upon graduation from the FBI Academy in Quantico, Virginia, I was assigned to the Springfield (Illinois) Division, Fairview Heights Resident Agency, where I investigated violent-crime and drug-trafficking cases. In November 2009, I transferred to the Miami (Florida) Division where I investigated public-corruption and identity-theft offenses. Then, from January 2013 until April 2016, I was assigned to the Minneapolis (Minnesota) Division, Grand Forks Resident Agency, where I investigated Indian County crimes, including homicides and sexual assaults of children. I am now assigned to the Milwaukee (Wisconsin) Division, Green Bay Resident Agency, where I investigate various federal offenses, including those mentioned.

2. The following facts come from the Kewaunee County (Wisconsin) Sheriff's Department ("KCSD"), the Brown County (Wisconsin) Sheriff's Department ("BCSD"), the Michigan State Police ("MSP"), other law enforcement agencies, witness statements, and my investigation, training, and experience. This affidavit is intended to show probable cause and does not set forth the entire investigation and knowledge about this matter.

3. Based on my training and experience and the following facts, there is probable cause to believe that 45-year-old Stanley J. Seifert III ("Seifert") (DOB: [REDACTED] 977) engaged in conduct in violation of 18 U.S.C. § 2251(a), Sexual Exploitation of a Minor.

Initial Complaint to KCSD

4. On September 1, 2022, KCSD responded to the Kewaunee County residence of adult female J.R., who reported that on August 29, 2022, she caught her 17-year-old daughter, JV- 1 (DOB: XX/XX/2005), nude in JV-1's bedroom masturbating with a hairbrush while on a

live-feed online video with an older male. J.R. got a clear view of the male on the video feed before the video disconnected. A screenshot of the male—Stanley Seifert—was on JV-1's phone, and J.R. confirmed that the male in the screenshot was the same male video chatting with JV-1. KCSD compared the screenshot to Stanley Seifert's WI DOT photo and confirmed Seifert's identity.

5. On September 1-2, 2022, KCSD took oral and written statements from JV-1, who said that she had been in an online relationship with "Stan Seifert" since she was 15 years' old. JV-1 believed that Seifert was originally from West Virginia, that he works in construction, and that he was currently staying in a hotel and working in Detroit, Michigan. JV-1 provided Seifert's picture, his phone number of 703-622-7255, his sister's names, his dog's name, and the type and color of his vehicle.

6. JV-1 said that on Monday, August 29, 2022, around 8:30pm, she and Seifert were video chatting online in her bedroom when Seifert asked her to get naked. JV-1 said no but Seifert got mad and kept asking her to remove her clothes, which she eventually did. Seifert asked JV-1 to masturbate with a hairbrush. JV-1 inserted the hairbrush into her vagina for about five minutes at which time her mother walked into the bedroom.

7. JV-1 said that she met Seifert about two years ago, when she was 15, while she was playing an online game called "Among Us." Thereafter, JV-1 communicated with Seifert by cell phone. In the summer of 2022, Seifert mailed JV-1 a black Samsung cell phone, GSM_SM-G781U Galaxy S20 FE, number 920-384-3200. Seifert enabled the parental controls on the Samsung S20 that he mailed to JV-1, which allowed him to remotely control some of the phone's operations. Seifert instructed JV-1 to use only this Samsung S20 phone to communicate with him. He told JV-1 that if she was caught speaking with him, she should remove the phone's SIM card, wipe the phone's data, and tell her parents that he was "Chris" from "Minnesota."

8. JV-1 received many gifts in the mail from Seifert, including coloring books and colored pencils. The gifts arrived under the name "Rose Oakley" at JV-1's address. This name was used as a cover in case other family members opened the packages.

9. At Seifert's direction, JV-1 provided sexual videos to Seifert during live-feed video sessions while Seifert would masturbate as JV-1 performed the sexual acts. Seifert would often threaten JV-1 that if she didn't do the sexual acts he requested, he would call and tell her parents what was happening between them.

Subsequent interviews with JV-1

10. On September 6, 2022, KCSD re-interviewed JV-1 about her contacts with Seifert. JV-1 said that she couldn't recall specifics about whether she and Seifert had discussed her age. She also said that she didn't know the type of vehicle he drove, but then said it was a Jeep.

11. On August 4, 2022, KCSD had taken a trespassing complaint about a Jeep entering the driveway of a rural property not far from JV-1's residence. The landowners were not there at the time, but a trail camera had been set up and captured photos of a distinct silver and black Jeep on the evening of July 9, and mornings of, July 11, July 25, and July 29, 2022. Although the photos are clear, the Jeep's license plate was somewhat blurred. However, when KCSD obtained the registration and description of Seifert's Jeep from WI DOT, they were consistent. Knowing this, an investigator with KCSD asked JV-1 whether Seifert had met her in the Jeep. JV-1 denied that she had met Seifert in person, but the investigator suspected that JV-1 was not being truthful about it.

12. On September 9, 2022, an investigator with BCSD interviewed JV-1. The interview was recorded, and a typed statement was prepared, which JV-1 signed as true and accurate. JV-1 reiterated that she met Seifert online when she was 15 while using the application "Among Us."

Seifert messaged her in the application, said that his name was Stanley Seifert and he lived in West Virginia, and that they should communicate in another application called Discord. She thought that Seifert was a teenager like her, but when they began to do online video chats, she saw that he looked like a 40-year-old man. Over the internet, Seifert sent her pictures of his penis, and he requested her to send him pictures of herself naked. She resisted, but he threatened to tell her parents that they were communicating and that she would get in trouble. She relented and—when she was 15—sent Seifert about five pictures of her nude breasts and vaginal area. Thereafter, they continued to engage in online video chats when she was 15 to 17 years' old, during which—at least once per week—she got naked and performed sexual acts at Seifert's request. At the time, she was using two Motorola Moto cell phones and a Samsung A42 cell phone that she got from her parents. JV-1 said that Seifert knew she was a minor because around her 16th birthday (in the summer of 2021), he asked if she was going to get her driver's license.

13. JV-1 said that Seifert repeatedly sent her gifts in the mail, addressed to "Oakley Rose," and he warned her when they were coming. Among the gifts were "sexy lingerie and underwear" that he forced her to wear during video chats in which JV-1 saw Seifert masturbating his penis.

14. In early 2022, JV-1 got into trouble with her parents over poor grades at school and they took her phone away. She then surreptitiously used her stepfather's Chrome Book to communicate with Seifert. In about May 2022, Seifert said that he would send her a cellphone. The phone—a Samsung Galaxy S20 referenced above—came in the regular U.S. mail, pre-configured with certain applications, passwords, and parental controls. Using the Samsung S20, JV-1 and Seifert engaged in weekly video chats where she performed sexual acts on herself at

Seifert's request, including instances where she took showers and used a vibrator that Seifert had sent to her.

15. Seifert repeatedly told JV-1 that he wanted to meet her, get her pregnant, and when she turned 18—live together. In June 2022, Seifert told JV-1 that he was moving to Wisconsin. JV-1 knew that Seifert got an apartment near Green Bay because she had access to his Amazon account and sent him a toy for his dog.

16. In the summer of 2022, just before her 17th birthday, Seifert picked her up at her home in the morning just after her parents left for work. They had communicated on the Samsung S20 that they were going to meet and have sex. She got into Seifert's Jeep and they drove to a nearby rural property, where they had sexual intercourse inside and outside the Jeep. Seifert did not wear a condom and he ejaculated on the ground next to the truck.

17. JV-1 said that they met and had sex four more times in much the same way. Seifert often used his cell phone to record them having sex, and he later showed her the recorded videos when they engaged in online video chats. They had vaginal and oral sex, and Seifert dropped her off when they were done. They did not have sex in August 2022 as Seifert was traveling for work.

18. Location data from the Samsung S20 that Seifert provided to JV-1 indicated that it was physically at the same location as the Jeep on July 29, 2022.

19. After JV-1 was caught naked on video chat with Seifert on August 29, 2022, her parents took away her electronic devices. Nonetheless, she used a Chromebook to communicate with Seifert, who told JV-1 to get the Samsung phone back, pull the SIM card, and factory reset the phone. Seifert also told JV-1 that he would come and get her on September 3, 2022. At this point, JV-1 became scared of Seifert and stopped communicating with him.

Forensic Exam of Samsung S20 that Seifert mailed to JV-1

20. On September 9, 2022, BCSD conducted a forensic examination of the Samsung Galaxy S20 cell phone Seifert provided to JV-1. The phone's packaging, which was found during a search warrant at Seifert's Green Bay-area apartment, indicates that it was manufactured in Vietnam. The phone had parental controls enabled. One of the stored contacts was labeled "Honey," which included Seifert's picture and telephone number 703-622-7255.

21. In the chat messages between Seifert and JV-1, there were extensive conversations in which both parties send and received pornographic images. Additionally, it appears JV-1 sent Seifert nude images of her breasts and vagina. Several conversations indicated JV-1 and Seifert had met in person, and did engage in sexual activity as they spoke in the past tense about engaging in sexual activities with each other, and wanting to repeat those activities. Other messages reflected JV-1 and Seifert angry with one another. Seifert threatened to withhold money and/or gifts based on thing JV-1 did that Seifert didn't like or because JV-1 refused to do things Seifert asked her to do. JV-1 also got upset with Seifert when he did not answer his phone or when he requested too many things of her.

22. For instance, on August 29, 2022—the same day that JV-1's mother interrupted the online video chat—numerous messages were sent and received between JV-1 and Seifert. Messages throughout the day reveal that JV-1 and Seifert discussed a vibrator, and that JV-1 would move out or run away from home. At one point, JV-1 states, "I could legally leave when I'm 18..." and they discuss options for JV-1 staying at a shelter or living with Seifert. They continue messaging and talk about dinner options and appear to argue. Later this day, between at 8:20pm and 8:57pm, the following message exchange occurred:

Seifert: "I'm calling"

JV-1: "Going on the site"

JV-1: "Mute tho"

Seifert: "Be a good little girl and find something I'm gonna like"

Seifert: "Not coffee but".. followed by a picture of a woman performing oral sex on a man with the caption, "Daddy wanted to start his day with a cup of coffee and a blowjob out on the patio".

Seifert: "I cant see you"

JV-1 sent a picture of a male having anal sex with a female from behind.

Seifert: responded with a picture of a female having anal sex with a male followed by a picture of a male holding his erect penis over a female laying down with the caption, "Please sir, use my face for your pleasure" and messaged, "Do you still want me to fuck you in the ass?"

JV-1: "1000000 tikes yes"

JV-1: "Times&"

Seifert: "It's time little one. Let me see my hips"

JV-1 sent a picture of a male having anal sex with a female followed by the caption, "Surprise"

Seifert: "Put that leg down so your hips are more visible"

Seifert: "I will. You need more light"

Seifert: "Does my little girl want me to record her playing with her pussy for daddy?"

JV-1 send a picture of a male and female who appear to be engaged in sexual intercourse.

Seifert: "That's a good girl. Show me without me asking" followed by a picture of an erect penis.

Seifert: "Light. You're laying perfectly but it's hard to see"

Seifert: "Is your little pussy wet?"

JV-1: "Yes Daddy"

JV-1: "Hang on"

Seifert: "Baby it's way too dark"

JV-1: "Daddy I'm close and I just started"

Seifert: "Keep going little one"

Seifert: "Ik how to slow you down. Turn around and show daddy from the back"

JV-1: "Daddy can u plz cum"

JV-1: "Daddy it's jot working"

JV-1: "It goes deeper this way"

Seifert: "Then put your face on the pillow and your ass in the air"

JV-1: "Tired"

JV-1: "Sore"

JV-1: "So much cumming today"

Seifert: "Tired"

Seifert: "Not a bad thing"

JV-1: "Pick me up"

Seifert: "Smoke then bed"

Seifert: "Yes baby"

JV-1: "idk if u could hear"

Seifert: "I couldn't" followed by two emojis.

JV-1: "Very sensitive"

JV-1: "Too sensitive"

JV-1: "I've never felt like that"
JV-1: "I don't like it"
JV-1: "I don't like the sensitiveness"
Seifert: "Sleep without panties so nothing is rubbing against you"
JV-1: "It's ur fault"
Seifert: "It was just an idea"
Seifert: "And that was a super aggressive middle finger"
JV-1: "Bc I don't like being sensitive...it doesn't feel good to me"
Seifert: "Idk what you mean"
Seifert: "Like to the touch?"
JV-1: "Yes"
Seifert: "Stop touching it then"
Seifert: "Duh"
JV-1: "I'm not"

21. Another message in this exchange, which appeared to be typed but not sent by JV-1, read, "Panties rubbed against." Based on the numerous messages, their timing, and my training and experience, I believe that this unsent message was being typed when JV-1's mother interrupted the online video chat between Seifert and JV-1 and that Seifert was likely instructing JV-1 on what acts to perform and viewing them on his device.

Arrest and Interview of Seifert

22. On September 8, 2022, the Kewaunee County District Attorney obtained an extradition warrant for Seifert on felony charges related to exposing a child to harmful material and exposing genitals/pubic area/intimate parts to a child. Seifert was arrested the same day by Michigan State Police ("MSP") in Novi, Michigan.

23. After being advised of and waiving his *Miranda* rights, Seifert told MSP the following: he shouldn't have been talking to JV-1, who he has known for a couple of years and knows that she's 17 years' old; they are "friends" but "pretend to be in a relationship"; they communicated by phone through messaging and video chats; he provided her with a cell phone; he has seen JV-1 naked on video chats a couple times per month, during which JV-1 would masturbate sometimes at his request; he did not send her naked pictures of himself and was clothed

during their video chats; their relationship did not get sexual until a couple months ago, but when asked if anything on his devices would refute that, he said “it shouldn’t”; after initially denying having met JV-1 in person, he admitted that they did, and that he went to her home and dropped off gifts, including coloring books and markers; this was the first time he had a friendship with an underage girl, and he only did so because he was unable to attract women his own age; it was all consensual, but when asked if what he did was “wrong,” he said “100%”; he knew better but did it anyway; and “God, this fucking ruined my whole life.”

Search of Seifert’s Ashwaubenon apartment

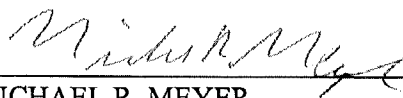
24. On September 8, 2022, KCSD and BCSD executed a search warrant at Seifert’s apartment in Ashwaubenon. One of the items recovered was an empty cell phone box with an identification sticker reading: SM-G781U, IMEI: 350533520105715, ICCID¹: 89012803320395446438, AT&T: 6691C. Based on my training and experience I know that an IMEI and ICCID are unique device identifiers. These unique identifiers match the Samsung phone that JV-1 provided to law enforcement. The box further identifies the device as being manufactured in Vietnam. Additionally, a receipt was located from an AT&T store in Green Bay, Wisconsin, showing the purchase of a Samsung SMG781U, Serial # 350533520105715 (which matches the IMEI), telephone number 920-384-3200, and customer name “Stanley S,” telephone number 703-622-7255.

25. At Seifert’s residence, officers also recovered Seifert’s Virginia driver’s license, Virginia license plates, women’s lingerie (size small), and an electronic device labeled “Vaginal Pump.”

¹ According to www.infobip.com, The ICCID is a globally unique serial number—a one-of-a-kind signature that identifies the SIM card itself.

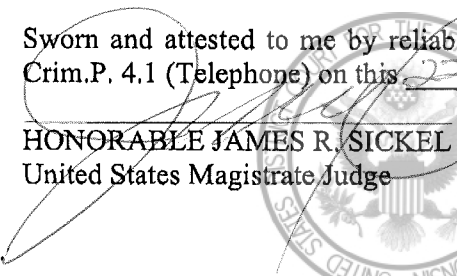
Conclusion

26. Based on the foregoing, there is probable cause to issue a criminal complaint and arrest warrant for Stanley J. Seifert III, charging him with a violation of 18 U.S.C. § 2251(a), Sexual Exploitation of a Minor.



MICHAEL R. MEYER
Special Agent
Federal Bureau of Investigation

Sworn and attested to me by reliable electronic means pursuant to the requirement of Fed. R. Crim.P. 4.1 (Telephone) on this 22 day of September, 2022.



HONORABLE JAMES R. SICKEL
United States Magistrate Judge

